

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

VICTORIA SOBOLESKI, on behalf of her-
self and others similarly situated,

Plaintiff,

v.

TERRASCEND CORP.,

Defendant.

Case No.: 4:25-cv-11763-FKB-DRG

Hon. F. Kay Behm

**DEFENDANT'S UNOPPOSED MOTION TO EXTEND
TIME TO RESPOND TO COMPLAINT**

Under Federal Rule of Civil Procedure 6 and Local Rule 7.1(a), Defendant TerrAscend Corp. moves this Court for a 14-day extension of time (through August 20, 2025) to answer or otherwise respond to the Complaint. Defendant states the following in support of this motion.

1. Defendant's current responsive pleading deadline is August 6, 2025, pursuant to an initial extension. ECF 4.

2. Defendant has diligently investigated Plaintiff's claims, but requires additional time to complete its preliminary investigation. Specifically, Defendant needs to assess its defenses to liability, whether early motion practice is warranted, and discuss with Plaintiff to determine whether this matter can be resolved without judicial intervention. Defendant also needs additional time because its counsel are on vacation until August 5. Accordingly, Defendant requests a 14-day extension to its response deadline.

3. This is Defendant's second extension to respond to the Complaint, and all parties consent to the relief sought.

4. The requested extension is made in good faith and not intended to delay the ultimate resolution of this case.

Accordingly, Defendant respectfully requests that the Court grant this motion and allow it until August 20, 2025, to answer, move, or otherwise respond to the Complaint.

Respectfully submitted,

/s/ Ryan D. Watstein

Ryan D. Watstein

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Dated: August 4, 2025

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**BRIEF IN SUPPORT OF DEFENDANT’S UNOPPOSED MOTION TO
EXTEND TIME TO RESPOND TO COMPLAINT**

CONCISE STATEMENT OF ISSUES PRESENTED

1. Whether this Court should enter an Order granting Defendant TerrAscend Corp. a fourteen-day extension to respond to Plaintiff's Complaint?

Plaintiff answers: Yes

Defendant answers: Yes

CONTROLLING OR MOST APPROPRIATE AUTHORITY

In support of its Motion for Extension of Time, Defendant TerrAscend Corp. relies on Fed. R Civ. P. 6(b).

**BRIEF IN SUPPORT OF DEFENDANT’S UNOPPOSED MOTION TO
EXTEND TIME TO RESPOND TO COMPLAINT**

In support of this Motion, Defendant relies on the facts and authority cited above. Defendant submits that good cause exists for the relief requested herein, as Defendant is working diligently to investigate the allegations in the complaint, and a brief extension will not delay this action, but instead will allow the parties to resolve these claims on the merits and potentially discuss an early resolution.

WHEREFORE, Defendant respectfully requests that the Court grant Defendant a 14-day extension from the current deadline of August 6, 2025, up through and including August 20, 2025.

Respectfully submitted,

/s/ Ryan D. Watstein
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Tel: (404) 782-0695
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Dated: August 4, 2025

CERTIFICATE OF SERVICE

I hereby certify that on August 4, 2025, I caused a true and correct copy of the foregoing to be filed with the Clerk of Court using the CM/ECF system, which will send notice of the electronic filing to all counsel of record.

By: /s/ Ryan D. Watstein
Ryan D. Watstein